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***Attorneys for Defendant***  
**LEFRAK ORGANIZATION, INC.**

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SERGIO BARRAGAN,

Case No.:  
07-CV-1469 (AKH)

Plaintiff,

-against-

ALAN KASMAN DBA KASCO, ANN TAYLOR  
STORES CORPORATION, BATTERY PARK CITY  
AUTHORITY, BLACKMON-MOORING-STEAMATIC  
CATASTROPHE, INC. D/B/A BMS CAT, BROOKFIELD  
FINANCIAL PROPERTIES, INC., BROOKFIELD  
FINANCIAL PROPERTIES, LP, BROOKFIELD  
PARTNERS, LP, BROOKFIELD PROPERTIES  
CORPORATION, BROOKFIELD PROPERTIES  
HOLDINGS INC., CAPITAL PROPERTIES, INC.,  
CAPITAL PROPERTIES, INC., CITY OF NEW YORK,  
COOPER SQUARE REALTY, INC., EMPIRE STATE  
PROPERTIES, INC., ENVIROTECH CLEAN AIR,  
INC., GOTHAM ESTATE LLC, GPS  
ENVIRONMENTAL CONSULTANTS, INC.,  
HILLMAN ENVIRONMENTAL GROUP, LLC.,  
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,  
JOSEPH MARTUSCELLO, KASCO RESTORATION  
SERVICES CO., LEFRAK ORGANIZATION, INC.,  
MERRILL LYNCH & CO., INC., NOMURA HOLDING  
AMERICA, INC., NOMURA SECURITIES  
INTERNATIONAL, INC., SAKELE BROTHERS,  
L.L.C, SENEX GREENWICH REALTY ASSOCIATES,  
LLC, STRUCTURE TONE (UK), INC., STRUCTURE  
TONE GLOBAL SERVICES, INC., TOSCORP INC.,  
TRINITY CENTRE, LLC, W ASSOCIATES LLC,  
WESTON SOLUTIONS, INC., WFP TOWER B CO.  
G.P. CORP., WFP TOWER B HOLDING CO., LP, AND  
WFP TOWER B. CO., L.P.,

**AMENDED NOTICE OF  
ADOPTION OF ANSWER  
TO MASTER  
COMPLAINT OF LEFRAK  
ORGANIZATION, INC.**

Defendants.

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**PLEASE TAKE NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Amended Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint Adding New Defendants Not Previously Served filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of In Re: World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

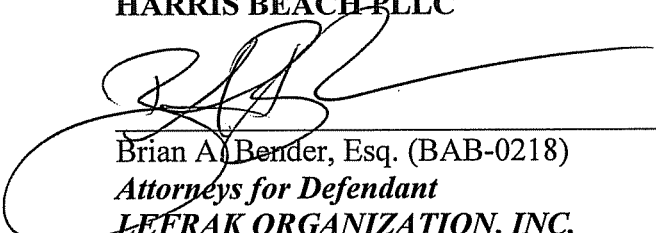
**PLEASE TAKE FURTHER NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., reserves its right to assert any defenses to which it is entitled, including, but not limited to those enumerated in Case Management Order No. 4 (¶¶D(1)-(5)).

**WHEREFORE**, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
December 31, 2007

Yours, etc.,

**HARRIS BEACH PLLC**



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